

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

BRANDON MATTHEW JONES	)	CHAPTER 13
DEBTOR	)	
	)	
	)	CASE NO. 1:23-bk-01084-HWV
NAVY FEDERAL CREDIT UNION	)	
MOVANT	)	
	)	
vs.	)	
	)	
BRANDON MATTHEW JONES and	)	
JACK N. ZAHAROPOULOS	)	
RESPONDENTS	)	
	)	

**DEBTOR'S RESPONSE TO NAVY FEDERAL CREDIT UNION'S  
MOTION TO OBTAIN RELIEF FROM STAY**

1. Movant, Navy Federal Credit Union filed its Motion for Relief from Stay on September 18, 2023.
2. Debtor acknowledges some vehicle payments are past due.
3. Debtor desires the opportunity to cure any post-petition mortgage arrears and keep his vehicle.
4. Debtor requests the Court deny Movant's Motion for Relief.

**WHERFORE**, Debtor, Brandon Matthew Jones, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed September 18, 2023, by Navy Federal Credit Union.

Dated: September 18, 2023

/s/Nicholas G. Platt  
Nicholas G. Platt (327239)  
Counsel for Debtor  
Mooney Law  
230 York Street  
Hanover, PA 17331  
ngp@mooney4law.com  
(717) 243-4770 Phone  
(717) 632-3612 Fax